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Infowars, LLC and Free Speech Systems, LLC*

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MATT FURIE,

Plaintiff,

vs.

INFOWARS, LLC; FREE SPEECH
SYSTEMS, LLC,

Defendants.

Case No. 2:18-cv-01830-MWF-JPR

**APPLICATION FOR LEAVE TO
FILE UNREDACTED VERSIONS
OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT
AND SUPPORTING
DOCUMENTS UNDER SEAL**

Hon. Michael W. Fitzgerald

Case Filed: March 5, 2018

Trial Date: July 16, 2019

1 Pursuant to L.R. 79-5.2.2, Defendants Free Speech Systems, LLC (“FSS”) and
2 Infowars, LLC (“Infowars”) file their application for leave to file unredacted versions
3 of their concurrently-filed Motion for Summary Judgment (the “Motion”) and
4 supporting documents under seal. Defendants’ Motion, as well as the supporting
5 Statement of Uncontroverted Facts and Conclusions of Law and exhibits thereto, make
6 reference to multiple documents designated as Confidential pursuant to the Protective
7 Order on file in this case (Doc. No. 62). Specifically, these documents are licensing
8 agreements Plaintiff Matt Furie entered into with third parties regarding use of the Pepe
9 the Frog character, and certain portions of the deposition of Mr. Furie referring to
10 certain contents of these agreements.

11 On April 5, 2019, counsel for the parties conferred regarding the necessity of
12 filing these designated documents under seal, or if redactions would be appropriate.
13 Counsel for Plaintiff stated that these documents did not need to be filed under seal in
14 their entirety and identified portions of these documents to be redacted. Under L.R.
15 79-5.2.2(a)-(b), a supporting declaration of counsel for Defendants is attached
16 identifying the redacted documents and efforts made to resolve the issues of redaction
17 and sealing.

1 Dated: April 17, 2019

Respectfully submitted,

2 RANDAZZA LEGAL GROUP, PLLC

3 /s/ Alex J. Shepard

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7 *Attorneys for Defendants,*

8 *Infowars, LLC and*

9 *Free Speech Systems, LLC*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 17, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notice of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Alex J. Shepard

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